

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

BLOCKFI INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered)

Hearing: February 21, 2023
at 10:00 a.m.

**NOTICE OF MOTION APPLICATION IN SUPPORT OF THE MOTION OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO SEAL THE NAMES OF
CERTAIN CONFIDENTIAL TRANSACTION PARTIES INTEREST RELATED TO
THE COMMITTEE'S PROFESSIONAL RETENTION APPLICATIONS AND FOR
RELATED RELIEF**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

PLEASE TAKE NOTICE that the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the Chapter 11 cases of BlockFi, Inc. and its affiliated debtors (collectively, the “**Debtors**,” the “**Company**,” or “**BlockFi**”), by and through its proposed counsel, will move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the “**Motion to Seal**”) for entry of an order, substantially in the form submitted herewith, (A) for authority to file under seal the redacted portions of those certain Applications for Retention of Professionals filed by and on behalf of the Committee as identified below (as further defined below, collectively, the “**Committee’s Retention Applications**” and the “**Committee’s Proposed Professionals**,” respectively), filed substantially contemporaneously herewith,² and (B) granting the Committee such other and further relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion to Seal will be held on **February 21, 2023 at 10:00 a.m.** (prevailing Eastern Time), or as soon thereafter as counsel may be heard (the “**Hearing**”) before Judge Kaplan at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8.

PLEASE TAKE FURTHER NOTICE that the Committee will be relying on the Application submitted in support of the Motion to Seal filed and served herewith.

² The Committee’s Retention Applications with the Confidential Information (as defined herein) redacted therefrom have been filed prior to the filing of this Motion to Seal. Unredacted versions of the Committee’s Retention Applications are being filed immediately after the filing of this Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (*see* [Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey \(uscourts.gov\)](https://www.uscourts.gov/process-to-electronically-request-that-a-document-be-sealed)).

PLEASE TAKE FURTHER NOTICE that objections, if any must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey 07102, in accordance with the Local Rules of the Bankruptcy Court (which can be found here https://www.njb.uscourts.gov/sites/default/files/local_rules/Local_Rules_Package_08-01-2021_final.pdf), and served upon Genova Burns, LLC, Attn: Donald W. Clarke, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey **so they are received no later than February 14, 2023.**

PLEASE TAKE FURTHER NOTICE that reserves the right to file reply papers with respect to any objections to the Motion to Seal in accordance with the Local Rules of the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that only those objections that are timely filed, served, and received will be considered at the Hearing. Failure to file a timely objection may result in entry of a final order granting the Motion to Seal as requested by the Committee.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested in the Motion to Seal may be granted without further notice.

Dated: January 25, 2023

GENOVA BURNS LLC

By: /s/ Donald W. Clarke

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